

EXHIBIT J

MR. CHEN'S CUSTODIAL FILE WOULD NOT BE ADDITIVE			
Category	Total Number of Exhibits	Percentage of Total Exhibits	Percentage of 367,800 Total Documents from 80 ZHP Party Custodians
Deposition Exhibits (13 ZHP Party witnesses, 133 hours of ordered testimony)	386	--	0.105%
Deposition Exhibits Mentioning Mr. Chen	14	3.6%	0.0038%
Email Exhibits Mentioning Mr. Chen	6	1.8%	0.0016%
Email exhibits “from” him	0	0%	0%
Email exhibits “to” him	2	0.6%	0.0005%
Email exhibits that “cc” him	2	0.6%	0.0005%
Email exhibits that “bcc” him	1	0.3%	0.0003%
Email exhibits mentioning Mr. Chen but not sent or received by him	1	0.3%	0.0003%
Exhibits that are not emails that mention Mr. Chen	8	2.1%	0.0022%
Documents he authored	0	0%	0%
Organizational charts	3	0.9%	0.0008%
Powerpoints noting him as founder	1	0.3%	0.0003%
EU/FDA inspection reports noting his role	2	0.6%	0.0005%
Memoranda addressed to him	1	0.3%	0.0003%
Signature on cover letter for DMF submission	1	0.3%	0.0003%